

ORIGINAL

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMES DOMINIC NERO
a.k.a. Shoe Shine

FILED	NOV 15 2022
CLERK, U.S. DISTRICT COURT	
By	Deputy

Criminal No.

FILED UNDER SEAL

3 - 22 CR 0429 - N

INDICTMENT

The Grand Jury charges:

Count One

Possession with the Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C))

On or about February 1, 2022, in the Dallas Division of the Northern District of Texas, the defendant, **James Dominic Nero, a.k.a. Shoe Shine**, did knowingly and intentionally possess with the intent to distribute and distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

Count Two

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c)(1)(A)(i))

On or about February 1, 2022, in the Dallas Division of the Northern District of Texas, the defendant, **James Dominic Nero, a.k.a. Shoe Shine**, did knowingly possess firearms, to wit: a Smith & Wesson pistol, model SW9VE, caliber 9mm, bearing serial number PBM2276, in furtherance of the commission of a drug trafficking crime for which the defendants may be prosecuted in a court of the United States, namely, conspiracy to distribute and possess with the intent to distribute cocaine base, a controlled substance, as alleged in Count One of this indictment.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

Count Three
Felon in Possession of a Firearm
(Violation of 18 U.S.C. § 922(g)(1))

On or about February 1, 2022, in the Dallas Division of the Northern District of Texas, defendant, **James Dominic Nero, a.k.a. Shoe Shine**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Smith & Wesson pistol, model SW9VE, caliber 9mm, bearing serial number PBM2276, and the firearm was in and affecting commerce.

In violation of 18 U.S.C. § 922(g)(1).

Forfeiture Notice
(21 U.S.C. § 853(a)(1) and (2))

Upon conviction of the offenses alleged in this indictment, the defendant shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as the result of such offense; and any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense.

Upon conviction for the offense alleged in Count Two of the indictment and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), defendant shall forfeit to the United States of America the firearm and ammunition involved in the commission of the respective offense, including but not limited to the following:

- 1) a Smith & Wesson pistol, model SW9VE, caliber 9mm, bearing serial number PBM2276, and
- 2) Any ammunition found with the firearm.

A TRUE BILL.



FOREMAN

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

JAMES DOMINIC NERO
a.k.a. Shoe Shine

SEALED INDICTMENT

21 U.S.C. § 841(a)(1) and (b)(1)(C)
Possession with the Intent to Distribute a Controlled Substance
(Count 1)

18 U.S.C. § 924(c)(1)(A)(i)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(Count 2)

18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm
(Count 2)

21 U.S.C. § 853(a)(1) and (2)
Forfeiture Notice

3 Counts

A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 15 day of November, 2022.

Warrant to be Issued



UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending